

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

**Midas Green Technologies, LLC,**

Plaintiff,

- vs. -

**Green Revolution Cooling, Inc.**

Defendant

Civil Action No. 6:24-cv-00166-ADA

**Jury Trial Demanded**

**PLAINTIFF MIDAS GREEN TECHNOLOGIES, LLC'S ANSWER TO**

**DEFENDANT GREEN REVOLUTION COOLING, INC.'S COUNTERCLAIMS**

Midas Green Technologies, LLC (“Midas”) hereby files this Answer to Green Revolution Cooling, Inc.’s (“GRC”) Counterclaims. Midas denies each and every allegation contained in GRC’s Countercomplaint except those specifically admitted below.

**PARTIES**

67. Admitted.

68. Admitted.

69. Admitted.

70. Admitted.

71. Admitted.

72. Admitted.

**JURISDICTION AND VENUE**

**COUNT 1**

**(Declaratory Judgment of Noninfringement of U.S. Patent No. 10,405,457)**

73. No answer needed.

74. Denied.

75. Denied.

76. Denied.

77. Denied.

**COUNT 2**

**(Declaratory Judgment of Invalidity of U.S. Patent No. 10,405,457)**

78. No answer needed.

79. Midas Admits that it alleged in its Complaint that the '457 Patent is valid and enforceable. To the extent not expressly admitted, all other allegations in this paragraph are Denied.

**COUNT 3**

**(Declaratory Judgment of Invalidity and/or Unenforceability of U.S. Patent No. 10,405,457)**

80. No answer needed.

81. Midas Admits that it alleged in its Complaint that the '457 Patent is valid and enforceable. To the extent not expressly admitted, all other allegations in this paragraph are Denied.

82. Midas lacks sufficient knowledge regarding the subject matter of this paragraph, and on that basis Denies all allegations in this paragraph.

83. Midas Admits that it purchased an immersion cooling system from GRC in 2010. To the extent not expressly admitted, all other allegations in this paragraph are Denied.

84. Midas lacks sufficient knowledge regarding the subject matter of this

paragraph, and on that basis Denies all allegations in this paragraph.

85. Midas lacks sufficient knowledge regarding the subject matter of this paragraph, and on that basis Denies all allegations in this paragraph.

86. Denied.

87. Denied.

88. Denied.

89. Denied.

90. Denied.

91. Denied.

#### **COUNT IV**

##### **(Declaratory Judgment of Christiaan Best as Sole Inventor of U.S. Patent No.**

**10, 405,457)**

92. No answer needed.

93. Denied.

94. Midas Admits that it purchased an immersion cooling system from GRC in 2010. To the extent not expressly admitted, all other allegations in this paragraph are Denied.

95. Midas Admits that it purchased an immersion cooling system from GRC in 2010. To the extent not expressly admitted, all other allegations in this paragraph are Denied.

96. Midas Admits that it purchased an immersion cooling system from GRC in 2010. To the extent not expressly admitted, all other allegations in this paragraph are Denied.

97. Midas Admits that there was no contract or communication that GRC and Midas would be co-inventors. To the extent not expressly admitted, all other allegations in this paragraph are Denied.

98. Denied.

99. Denied.

**COUNT V**

**(Declaratory Judgment of Inequitable Conduct of U.S. Patent No. 10,405,457)**

100. No answer needed.

101. Denied.

102. Denied.

103. Denied.

104. Denied.

105. Midas acknowledges the obligations set forth in 37 C.F.R § 1.56. To the extent not expressly admitted, all other allegations in this paragraph are Denied.

106. Denied.

107. Denied.

108. Denied.

**JURY DEMAND**

Midas also respectfully requests a trial by jury.

**PRAYER FOR RELIEF**

Midas respectfully requests that GRC's prayer for relief be Denied in its entirety, that the counter-complaint be dismissed without prejudice, and that judgment be entered in Midas' favor, and that Court award any further relief it deems just and proper.

DATED: July 5, 2024

Respectfully submitted,

*/s/ Joseph E. Thomas*  
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**CERTIFICATE OF SERVICE**

I hereby certify that counsel of record who have appeared electronically in this case are being served with this document on July 5, 2024 by way of the primary email address that said counsel supplied to the Court's CM/ECF system.

*/s/ Tierra Mendiola*